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6 Attorneys for Defendant
7 Ryder Integrated Logistics, Inc.

8 Gerald Emanuel (SBN 61049)
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12 Attorneys for Plaintiff
13 Daniel Paz

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 DANIEL PAZ,

18 Plaintiff,

19 vs.

20 RYDER INTEGRATED LOGISTICS,
21 INC., a Delaware Corporation; and DOES
1-50, inclusive,

22 Defendants.

Case No. C 08-05168 SC

**STIPULATION TO CONTINUE
CASE MANAGEMENT
CONFERENCE**

**JUDGE: HONORABLE SAMUEL
CONTI**

**DATE: FEBRUARY 19, 2010
TIME: 10:00 A.M.**

1 IT IS HEREBY STIPULATED by and between plaintiff Daniel Paz and
2 Defendant Ryder Integrated Logistics, Inc. ("Ryder") that the Case Management
3 Conference, currently scheduled for February 19, 2010, at 10:00 a.m., be continued
4 until March 19, 2010, at 10:00 a.m., or any other date that the court deems
5 appropriate.

6 Good cause exists to continue the Case Management Conference to March 19,
7 2010 for the reasons described below.

8 Plaintiff Daniel Paz and Ryder have reached a settlement in this matter. The
9 parties are in the process of finalizing the settlement documents and expect to be in a
10 position to file the stipulation of dismissal of the entire action with prejudice and
11 proposed order of dismissal.

12 For these reasons, good cause exists to continue the Case Management
13 Conference, previously scheduled for February 19, 2010, at 10:00 a.m. to March 19,
14 2010, at 10:00 a.m.

15
16 **IT IS SO STIPULATED.**

17 DATED: February 16, 2010

REED SMITH LLP

18 By /s/ Linda S. Husar
19 Linda S. Husar
20 Attorneys for Defendant
Ryder Integrated Logistics, Inc.

21 DATED: February 16, 2010

22 HINKLE, JACHIMOWICZ, POINTER
& EMANUEL

23 By /s/ Gerald Emanuel
24 Gerald Emanuel
25 Attorneys for Plaintiff Daniel Paz

1 DANIEL PAZ v. RYDER INTEGRATED LOGISTICS, INC., et al.

2 CASE NO. 3:08-CV-05168-SC

3 **CERTIFICATE OF SERVICE BY ELECTRONIC MAIL**

4 I am a resident of the State of California, over the age of eighteen years, and not
5 a party to the within action. My business address is REED SMITH LLP, 355 South
6 Grand Avenue, Suite 2900, Los Angeles, CA 90071-1514. On February 16, 2010, I
7 served the following document:

8
9 **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE**

10 by transmitting via facsimile on this date from fax number +1 213 457 8080
11 the document(s) listed above to the fax number(s) set forth below. The
12 transmission was completed before 5:00 PM and was reported complete and
13 without error. The transmission report, which is attached to this proof of
14 service, was properly issued by the transmitting fax machine. Service by fax
15 was made by agreement of the parties, confirmed in writing. The
16 transmitting fax machine complies with Cal.R.Ct 2003(3).
17 by placing the document(s) listed above in a sealed envelope with postage
18 thereon fully prepaid, in the United States mail at Los Angeles, California
19 addressed as set forth below. I am readily familiar with the firm's practice of
20 collection and processing of correspondence for mailing. Under that practice,
21 it would be deposited with the U.S. Postal Service on that same day with
22 postage thereon fully prepaid in the ordinary course of business. I am aware
23 that on motion of the party served, service is presumed invalid if the postal
24 cancellation date or postage meter date is more than one day after the date of
deposit for mailing in this Declaration.
25 by placing the document(s) listed above in a sealed envelope(s) and by
26 causing personal delivery of the envelope(s) to the person(s) at the
27 address(es) set forth below. A signed proof of service by the process server
28 or delivery service will be filed shortly.
29 by causing personal delivery of the document(s) listed above to the person(s)
30 at the address(es) set forth below.
31 by placing the document(s) listed above in a sealed envelope(s) and
32 consigning it to an express mail service for guaranteed delivery on the next
33 business day following the date of consignment to the address(es) set forth
34 below. A copy of the consignment slip is attached to this proof of service.
35 by transmitting via email to the parties at the email addresses listed below:

Gerald A. Emanuel, Esq.
HINKLE, JACHIMOWICA, POINTER & EMANUEL
2007 West Hedding Street, Ste. 100
San Jose, CA 95128
jemanuel@hinkle.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2010, at Los Angeles, California.

Corinne Ubence /s/

1 Linda S. Husar (SBN 93989)
2 Aundrea L. Newsome (SBN 240041)
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3 355 South Grand Avenue, Suite 2900
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14 Daniel Paz

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 DANIEL PAZ,
18 Plaintiff,
19 vs.
20 RYDER INTEGRATED LOGISTICS,
INC., a Delaware Corporation; and DOES
1-50, inclusive,
22 Defendants.

23 Case No. C 08-05168 SC

24 **[PROPOSED] ORDER RE
STIPULATION TO CONTINUE
CASE MANAGEMENT
CONFERENCE**

25 **JUDGE: HONORABLE SAMUEL
CONTI**

26 **DATE: FEBRUARY 19, 2010
TIME: 10:00 A.M.**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

3 That the Case Management Conference, currently scheduled for February 19,
4 2010, at 10:00 a.m., be continued until March 19, 2010, at 10:00 a.m.

5 IT IS SO ORDERED.

6 DATED: February 17, 2010

7 By

8 Honorable



3 CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

4 I am a resident of the State of California, over the age of eighteen years, and not
5 a party to the within action. My business address is REED SMITH LLP, 355 South
6 Grand Avenue, Suite 2900, Los Angeles, CA 90071-1514. On February 16, 2010, I
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10 MANAGEMENT CONFERENCE**

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4 2007 West Hedding Street, Ste. 100
5 San Jose, CA 95128
6 jemanuel@hinkle.com

7
8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct.

10
11 Executed on February 16, 2010, at Los Angeles, California.

12
13

14 /s/
15 Corinne Ubence
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